

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Porter Clark,

Debtor.

Case No. 22-10376-AMC
Chapter 13

Objection to Motion for Relief from the Automatic Stay

Debtor Porter Clark, through his attorney, objects to the Motion for Relief from the Automatic Stay filed by Wilmington Savings Fund Society, FSB, not in its individual capacity but solely in its capacity as Owner Trustee for Ocwen Loan Acquisition Trust 2024-HB1.

1. The Debtor intends to resolve this matter by paying the Movant in the amount of \$1,743.00 to cover the cost of the hazard insurance.

2. The Motion fails to state grounds for relief in support of waiving the fourteen-day stay prescribed by Fed. R. Bankr. P. 4001(a)(3).

3. If the Court grants the Motion notwithstanding this objection, it must not grant relief further than modifying the automatic stay to permit the Movant to enforce its *in rem* rights under applicable nonbankruptcy law with respect to the property located at 8249 Temple Road. *See* 11 U.S.C. § 362 (c)(1).

For those reasons, the Court must deny the Motion.

Date: June 5, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: 

Mike Assad (#330937)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
help@cibiklaw.com

Certificate of Service

I certify that on this date, I did cause a copy of this document and all attachments to be electronically served on all parties on the Clerk's service list that are registered to receive notices through the CM/ECF system. I did not serve anyone by mail.

Date: June 5, 2024



Mike Assad